

CONFIDENTIAL BUSINESS INFORMATION

Ledwith, Cara L.

From:

Miller, Jeff

Sent:

Monday, October 03, 2011 11:26 AM

To:

CasualtyRiskExcessFirstNotice@acegroup.com; Wsgumb-Iteclaims@acegroup.com

Cc:

Ledwith, Cara L.; Peterson, Lisa

Subject:

Lower Duwamish Waterway Superfund Site - Industrial Indemnity - forwarding tender

letters

Attachments:

IndustrialIndemnityCorrespondence.pdf

To ACE:

On behalf of Kaiser Cement Corporation, and separately on behalf of Kaiser Gypsum Company, Inc., we put Industrial Indemnity on notice of claims against it at the Lower Duwamish Waterway Superfund Site last December.

As you can see from the attached correspondence, we subsequently learned that ACE USA may have assumed responsibility for the subject policy. On the advice of Patricia Noll, U.S. Fire Insurance Company, we forwarded the tender letters to Jennifer Bonner at Resolute Management on August 15, 2011.

We have not yet received acknowledgment of the tender letters. Please acknowledge receipt of Kaiser Cement's December 22, 2010 notice letter and Kaiser Gypsum's December 21, 2011 notice letter and state the coverage position of Industrial Indemnity.

Thank you for your assistance.

Jeff

Jeff Miller MILLER NASH LLP

500 East Broadway | Suite 400 | Vancouver, Washington 98660-3324

Office: 360-699-4771 | Fax: 360-694-6413

<u>Jeff.Miller@MillerNash.com</u> | www.millernash.com

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Jeffrey C. Miller jeff.miller@millernash.com

August 15, 2011

Resolute Management Inc. United Plaza – Suite 700 30 South 17th Street Philadelphia, Pennsylvania 19103 ATTN: Ms. Jennifer Bonner

Subject:

Insured: Kaiser Cement Corporation

Insurer: Industrial Indemnity

Policy No. (Period): JE-8312723 (04/01/81-04/01/83) Claim: Lower Duwamish Waterway Superfund Site

Dear Ms. Bonner:

We represent Kaiser Cement Corporation ("KCC"), in connection with the investigation that it is required to undertake in order to respond to the United States Environmental Protection Agency's ("EPA") February 19, 2010, request for information served on KCC pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9604(e).

Based on our records, Industrial Indemnity sold an excess and/or umbrella liability insurance policy to KCC during the period from 1981 through 1983. The specific Industrial Indemnity policy that we have located to-date is listed above.

We put Industrial Indemnity on notice of EPA's potential claims against KCC by letter dated December 22, 2010, (see Attachment A). Subsequently, we received information from United States Fire Insurance Company that ACE USA may have assumed financial responsibility for the subject policy (see Attachment B). We have still not received acknowledgement of KCC's tender letter and would appreciate that you do so at your earliest convenience.

We also represent Kaiser Gypsum Company, Inc. ("Kaiser Gypsum") with respect to its claim for insurance coverage for any liability it has related to the Site. Kaiser Gypsum has yet to receive acknowledgment of its December 21, 2010, tender letter to Industrial Indemnity (see Attachment C). To be clear, the claims tendered to Industrial Indemnity by KCC and Kaiser Gypsum are separate and distinct claims for



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Resolute Management Inc. ATTN: Ms. Jennifer Bonner August 15, 2011 Page 2

coverage under Industrial Indemnity policies because Kaiser Gypsum and KCC are separate legal entities that owned and operated at different locations on the Lower Duwamish Waterway and received separate Section 104(e) information requests from the EPA. The two entities have separately responded to EPA's information requests and continue to incur separate and distinct defense costs. Accordingly, we request that Industrial Indemnity separately acknowledge the two tender letters and assign separate claim numbers for the KCC and Kaiser Gypsum claims.

If you have any questions, please e-mail me at jeff.miller@millernash.com or call me at (360) 699-4771.

110

Jeffrey C. Miller

ATTACHMENT A

kr:2005337



500 East Broadway Suite 400 Vancouver, Washington 98660-3324 office 360.699.4771 fax 360.694.6413

Steven F. Hill, P.C. Admitted in Washington and Oregon steve.hill@millernash.com (360) 619-7004 direct line

December 22, 2010

BY CERTIFIED MAIL RETURN RECEIPT REQUESTED

Aon Risk Insurance Services West, Inc. c/o Registered Agent
Prentice Hall Corp System
300 Deschutes Way SW, Suite 304
Tumwater, WA 98501

Aon Risk Services, Inc.
Of Washington
c/o Registered Agent
Corporate Service Company
300 Deschutes Way SW, Suite 304
Tumwater, WA 98501

Aon Service Corporation c/o Corporation Service Company 300 Deschutes Way SW, Suite 304 Tumwater, WA 98501

Subject:

Insured:

Insurer:

Kaiser Cement Corporation

Industrial Indemnity

Certain Underwriters at Lloyd's, London

Policy No. (Periods):

Claim:

See Enclosed

Lower Duwamish Waterway Superfund Site

Dear Ladies and Gentlemen:

We represent Kaiser Cement Corporation, now known as Hanson Permanente Cement, Inc. ("KCC"), in connection with the necessary investigation that it is undertaking in order to respond to the United States Environmental Protection Agency's ("EPA") February 19, 2010 request for information served on KCC pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. § 9604(e). Section 104(e) of CERCLA obligates

KG2005338

039391-0008/VANDOCS:5014470#



Aon Risk Insurance Services West, Inc. Aon Risk Services, Inc. of Washington Aon Service Corporation December 22, 2010 Page 2

KCC to respond to EPA's multi-part questions relating to KCC's historical ownership and operations on riparian property that KCC formerly owned along the Lower Duwamish Waterway ("LDW") in Seattle, Washington. The LDW is a waterway that has been listed on the CERCLA National Priorities List as a federal Superfund site (the "LDW Superfund Site") due to the release or substantial threat of release of hazardous substances in or around the waterway. Compliance with the EPA's Section 104(e) information request is required by law, and failure to respond may subject KCC to an EPA enforcement action and civil penalties of up to \$37,500 per day.

KCC is in the process of investigating its historical connection with the LDW. To date, we have only been able to confirm that KCC owned property and conducted cement operations at two separate locations along the LDW, including 5906 West Marginal Way S.W. (the "Westside Property") and 5975 East Marginal Way S. (the "Eastside Property") in Seattle, Washington (collectively referred to as the "Seattle Properties"). In addition, our preliminary review of historical documents, including publicly available real property records, has confirmed the following:

- KCC purchased a portion of the Eastside Property in June 1944.
 KCC constructed a cement distribution facility on the Eastside Property, which started operation in approximately October 1946.
 The facilities on the Eastside Property that were owned and operated by KCC included a dolphin pier, silos, storage facilities, a sacking plant, railroad spurs, truck loading accommodations, and an office building.
- In December 1953, KCC sold a portion of the Eastside Property to Kaiser Gypsum Company, Inc.
- In October 1958, KCC purchased additional real property, including a water inlet, from Commercial Waterway District No. 1, in order to expand the Eastside Property.
- In January 1965, KCC entered into a long-term lease with the Port
 of Seattle (the "Port") for the Westside Property. A condition of the
 lease required KCC to build a cement manufacturing and
 distribution facility. This facility was constructed and began
 operations in 1967. KCC entered into a real estate contract with the



Aon Risk Insurance Services West, Inc. Aon Risk Services, Inc. of Washington Aon Service Corporation December 22, 2010 Page 3

Port in May 1969. By fulfillment deed, KCC acquired fee title in the Westside Property on September 17, 1973.

- On October 1, 1985, KCC sold all of its interest in the remainder of the Eastside Property to Riedel International, Inc.
- On April 14, 1987, KCC sold all of its interest in the Westside Property to Lone Star Industries, Inc.

KCC has not located any former officers or employees of KCC with knowledge of its operations at the Seattle Properties. On June 23, 2010, KCC filed a preliminary response to EPA's Section 104(e) information request based on the information we were able to gather, including the information recited above, from real property records, tax records, and certain historical documents that were previously gathered by KCC's defense counsel during KCC's defense of asbestos litigations.

We understand that at or around the time that it ceased active business operations, KCC collected certain of its business records and sent them to storage facilities in California. These documents cover a variety of historical information, and are believed to contain documents related to historical KCC operating facilities in multiple states, including Washington. KCC was able to locate certain indexes of the California documents, but these indexes were not created with EPA's Section 104(e) information request in mind. Therefore, it is very difficult to determine the extent of documents that might contain information responsive to EPA's Section 104(e) information request or the scope of document review that might be necessary to search for such documents. We do know, however, that there are approximately 10,000 boxes of historic documents stored in California.

During preparation of KCC's response to the Section 104(e) information request, we contacted EPA and informed EPA that these historical records existed. We also indicated to EPA that, given the volume of these historical documents, we would not be able to review them by the deadline EPA had imposed for KCC's response. EPA requested that KCC file a preliminary response to the Section 104(e) information request by its deadline using the information and documents readily available to KCC. EPA further requested that KCC agree to conduct a thorough review of the historical records and supplement its response to the Section 104(e) information request in the next few months.



Aon Risk Insurance Services West, Inc. Aon Risk Services, Inc. of Washington Aon Service Corporation December 22, 2010 Page 4

At this time, our office has conducted a preliminary review of the available box indexes for the California documents and it is clear that some boxes may contain information responsive to EPA's Section 104(e) information request. In order to fully respond to EPA's Section 104(e) information request and avoid the imposition of liability on KCC for failing to have done so, counsel for KCC will need to conduct extensive searches of the California documents over the next few months and will need to supplement KCC's preliminary response, as appropriate, based on any responsive information identified as a result of such searches. In sum, KCC needs to undertake the process of conducting an investigation of the available information in order to complete its legal obligation to respond to EPA's Section 104(e) information request.

At this time, we do not know if KCC may have contributed to any contamination of the LDW Superfund Site. But as a former owner of property within the boundaries of the LDW Superfund Site, KCC is potentially liable for any contamination of the LDW Superfund Site that may have occurred during KCC's ownership and operation of the Seattle Properties. In order to assess its potential liability and to comply with its legal obligation to respond to EPA's Section 104(e) information request, KCC is obligated to complete its review of the historical corporate documents stored in California.

Based on our records, the insurance companies identified on the enclosed list sold excess and/or umbrella liability insurance policies to KCC (formerly known as Permanente Cement Company and Kaiser Cement & Gypsum Corporation), naming KCC as an additional insured, during the period from 1953 through 1985. The specific policies that we have located to date are listed on the enclosure.

The EPA's Section 104(e) information request requires KCC to defend itself from any claims that it is a liable party for the contamination discovered in the LDW Superfund Site. Should further review of historical records establish a basis for KCC's potential liability for contamination of the LDW Superfund Site, we expect that EPA will name KCC as a potentially responsible party for the LDW Superfund Site. Accordingly, on behalf of KCC, we hereby put Industrial on notice of this potential claim and request that Industrial provide coverage for this claim and any other claims against KCC that are related to the LDW Superfund Site.



Aon Risk Insurance Services West, Inc. Aon Risk Services, Inc. of Washington Aon Service Corporation December 22, 2010 Page 5

If you have any questions, please e-mail me at steve.hill@millernash.com or call me at 360.699.4771.

Very truly your

Steven F. Hill, P.C.

Enclosure

001

Susan M. Breen-Quinn

Brian Kelly Claire Louis

KG2005342

039391-0008/VANDOCS:5014470

POLICIES

Carrier:

Industrial Indemnity

Policies:

JE8312723 (04/01/81-04/01/83)

Certain Underwriters at Lloyd's, London (C.T. Bowring)

PY024577 (10/01/77-10/01/78)

Reed Stenhouse Cert. LUS1294 / PY008381 (04/01/80-04/01/81)

LUS1324 / PY027381 (04/01/81-04/01/84) LUS1325 / PY027481 (04/01/81-04/01/84)

LUS1326 / PY027581 (04/01/81-04/01/82)

LUS1355 (04/01/82-04/01/83)

Certain Underwriters at Lloyd's, London

(J.H. Minet / Landis Pelletler & Parrish)

70107/51910 (03/01/53-03/01/54)

70108/54151 (03/01/54-03/01/55)

73158/LL56155 (03/01/55-03/01/56)

78500/57238 (09/15/55-09/15/58)

75211/LL57956 (03/01/56-03/01/57)

LL2453 (09/17/56-09/17/59)

76128/LL60090 (03/01/57-03/01/58)

79409/62100 (03/01/58-03/01/59)

64500/81538 (03/01/59-03/01/60)

LL65521 (09/15/59-09/15/60)

LL67473 (09/15/60-09/15/61)

LL67477 (09/15/60-09/15/61)

LL69261 (09/15/61-09/15/62)

Certain Underwriters at Lloyd's, London

(J.H. Minet / Chapman & Co / Landis Pelletier & Parrish)

79882 (09/15/58-9/15/60)

79883 (09/15/58-09/15/59)

79884 (09/15/58-09/15/60)

79885 (09/15/58-09/15/60)

80900 (09/15/59-12/31/61)

83086 (09/15/60-12/31/61)

83024 (09/15/60-12/31/61)

83143 (09/15/60-12/31/61)

KG2005343

VANDOCS:50144693

Certain Underwriters at Lloyd's, London (J.H. Minet; notice to Landis Pelletier & Parrish) LL73974 (09/17/53-09/17/56) LL65521 (09/15/59-09/15/60) 61560/LL69700 (12/31/61-12/31/63) 61561/LL69701 (12/31/61-12/31/63) 64564 (12/31/63-12/31/64) 64022 (12/31/63-12/31/64)

Certain Underwriters at Lloyd's, London (J.H. Minet; notice to Underwriters Service, Inc.)
LUS1031/LUS1031A/031382000 (12/31/64-01/01/68)
LUS1032/LUS1032A/031383000 (12/31/64-01/01/68)
LUS1033/LUS1033A/301384000 (04/22/65-01/01/68)
LUS1037/LUS1037A/301384000 (06/01/65-06/01/68)
LUS1066/LUS1066A/025114000 (01/01/68-01/30/71)
LUS1067/LUS1067A/025115000 (01/01/68-01/30/71)
LUS1068/LUS1068A/025116000 (01/01/68-01/31/71)
LUS1069 (01/01/68-01/01/71)

Certain Underwriters at Lloyd's, London (Howden) SCU 956483/ 57545/83 (04/01/83-05/01/84) XL500280/57546/83 (04/01/83-05/01/84) XS740072G/58548/84 (05/01/84-04/01/85) SCU956816/58552/84 (05/01/84-04/01/85) XS740074G/58550/84 (05/01/84-04/01/85) XC740075G/58551/84 (05/01/84-04/01/85) 834/58549/84 (05/01/84-04/01/85)

Certain Underwriters at Lloyd's, London (Sedgwick, notice to Alexander & Alexander / Clifton & Company) Risk No. UQA0091 (04/01/83-04/01/84) Risk No. UQA0092 (04/01/83-04/01/84)

KG2005344

VANDOCS:5014469第

ATTACHMENT B

Miller, Jeff

From: Sent: Noll, Pat <Pat_Noll@cfins.com> Thursday, July 28, 2011 8:19 AM

To:

Miller, Jeff

Cc:

Harrell, Ronald; Stevens, Alice

Subject:

FW: Lower Duwamish Waterway Superfund Site - Industrial Indemnity - forwarding

Kaiser Cement's tender letter

Attachments:

12-22-10 Industrial Indemnity Notice - EU.pdf

Dear Mr. Miller:

Your correspondence has been referred to me for response. Please be advised we have no information suggesting that any of the AON entities, the addressees in your attached letter, ever forwarded your letter to our company. Our Company is not the successor to Industrial Indemnity Company, although under the restructuring that took place in the early 1990s, our Company did assume the financial responsibility for certain Industrial policies. The policy cited in your letter is not one that was assumed by United States Fire Insurance Company in the restructuring, and is not in a numbering convention of any policy U.S. Fire assumed in the restructuring. Our company does not have access to the policy records of the other former affiliates that assumed Industrial Indemnity policies. Accordingly, I cannot confirm any details about that particular policy. However, based upon the numbering convention, I would suggest that you consider submitting the correspondence to ACE USA for further investigation.

I believe the current claims administrator for ACE is: Resolute Management Inc., United Plaza – Suite 700, 30 South 17th Street, Philadelphia, PA 19103. Attn: Jennifer Bonner.

I trust this responds to your inquiry.

Very truly yours,

Patricia L. Noll
Vice President
United States Fire Insurance Company

Crum & Forster Latent/CD Claims P.O. Box 1904 412 Mt. Kemble Ave., Suite 20 Morristown, NJ 07962-1904 Phone: 973-631-5970

Fax: 973-631-5999 pat_noll@cfins.com

ATTACHMENT C



Steven F. Hill, P.C.

Admitted in Washington and Oregon steve.hill@millernash.com (360) 619-7004 direct line

WWW.MILLERNASH.COM

December 21, 2010

500 East Broadway Suite 400 Vancouver, Washington 98660-3324 office 360.699.4771 FAX 360.694.6413

BY CERTIFIED MAIL. RETURN RECEIPT REQUESTED

Aon Risk Insurance Services West, Inc. c/o Registered Agent Prentice Hall Corp System 300 Deschutes Way SW, Suite 304 Tumwater, WA 98501

Aon Risk Services, Inc.
Of Washington
c/o Registered Agent
Corporate Service Company
300 Deschutes Way SW, Suite 304
Tumwater, WA 98501

Aon Service Corporation c/o Corporation Service Company 300 Deschutes Way SW, Suite 304 Tumwater, WA 98501

Subject:

Insured: Kaiser Gypsum Company, Inc.

Insurer: Industrial Indemnity

Certain Underwriters at Lloyd's, London

Policy No. (Periods): See Enclosed

Claim: Lower Duwamish Waterway Superfund Site

Ladies and Gentlemen:

We represent Kaiser Gypsum Company, Inc. ("KGC"), in connection with the necessary investigation that it is undertaking in order to respond to the United States Environmental Protection Agency's ("EPA") February 19, 2010 request for information served on KGC pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. §9604(e). Section 104(e) of CERCLA obligates KGC to respond to EPA's multi-part questions relating to KGC's historical ownership and operations on riparian property

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Aon Risk Insurance Services West, Inc. Aon Risk Services, Inc. of Washington Aon Service Corporation December 21, 2010 Page 2

that KGC formerly owned along the Lower Duwamish Waterway ("LDW") in Seattle, Washington. The LDW is a waterway that has been listed on the CERCLA National Priorities List as a federal Superfund site (the "LDW Superfund Site") due to the release or substantial threat of release of hazardous substances in or around the waterway. Compliance with the EPA's Section 104(e) information request is required by law, and failure to respond may subject KGC to an EPA enforcement action and civil penalties of up to \$37,500 per day.

KGC is in the process of investigating its historical connection with the LDW. To date, we have only been able to confirm that KGC owned property and operated a gypsum plant at 5931 East Marginal Way S. in Seattle, Washington on the eastern side of the LDW (the "KGC Property") from 1952 to 1978. To date, KGC has not located any former officers or employees of KGC with knowledge of its operations at the KGC Property. On June 23, 2010, KGC filed a preliminary response to EPA's Section 104(e) information request based on the information we were able to gather from real property records, tax records, and certain historical documents that were previously gathered by KGC's defense counsel during KGC's defense of asbestos litigations.

We understand that at or around the time that it ceased active business operations, KGC collected certain of its business records and sent them to storage facilities in California. These documents cover a variety of historical information, and are believed to contain documents related to historical KGC operating facilities in multiple states, including Washington. KGC was able to locate certain indexes of the California documents, but these indexes were not created with EPA's Section 104(e) information request in mind. Therefore, it is very difficult to determine the extent of documents that might contain information responsive to EPA's Section 104(e) information request or the scope of document review that might be necessary to search for such documents. We do know, however, that there are approximately 10,000 boxes of historic documents stored in California.

During preparation of KGC's response to the Section 104(e) information request, we contacted EPA and informed EPA that these historical records existed. We also indicated to EPA that, given the volume of these historical documents, we would not be able to review them by the deadline EPA had imposed for KGC's response. EPA requested that KGC file a preliminary response to the Section 104(e) information request by its deadline using the information and documents readily available to KGC. EPA further requested that KGC agree to conduct a thorough review of the historical



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Aon Risk Insurance Services West, Inc. Aon Risk Services, Inc. of Washington Aon Service Corporation December 21, 2010 Page 3

records and supplement its response to the Section 104(e) information request in the next few months.

At this time, our office has conducted a preliminary review of the available box indexes for the California documents and it is clear that some boxes may contain information responsive to EPA's Section 104(e) information request. In order to fully respond to EPA's Section 104(e) information request and avoid the imposition of liability on KGC for failing to have done so, counsel for KGC will need to conduct extensive searches of the California documents over the next few months and will need to supplement KGC's preliminary response, as appropriate, based on any responsive information identified as a result of such searches. In sum, KGC needs to undertake the process of conducting an investigation of the available information in order to complete its legal obligation to respond to EPA's Section 104(e) information request.

At this time, we do not know if KGC may have contributed to any contamination of the LDW Superfund Site. But as a former owner of property within the boundaries of the LDW Superfund Site, KGC is potentially liable for any contamination of the LDW Superfund Site that may have occurred during KGC's ownership and operation of the KGC Property. In order to assess its potential liability and to comply with its legal obligation to respond to EPA's Section 104(e) information request, KGC is obligated to complete its review of the historical corporate documents stored in California.

Based on our records, the companies identified on the enclosed list sold excess and/or umbrella liability insurance policies to KGC or its parent Hanson Permanente Cement, Inc. (formerly known as Kaiser Cement & Gypsum Corporation and Kaiser Cement Corporation), naming KGC as an additional insured, during the period from 1953 through 1985. The specific policies that we have located to date are listed on the enclosure.

The EPA's Section 104(e) information request requires KGC to defend itself from any claims that it is a liable party for the contamination discovered in the LDW Superfund Site. Should further review of historical records establish a basis for KGC's potential liability for contamination of the LDW Superfund Site, we expect that EPA will name KGC as a potentially responsible party for the LDW Superfund Site. Accordingly, on behalf of KGC, we hereby put Industrial on notice of this potential claim and request that Industrial provide coverage for this claim and any other claims against KGC that are related to the LDW Superfund Site.



Aon Risk Insurance Services West, Inc. Aon Risk Services, Inc. of Washington Aon Service Corporation December 21, 2010 Page 4

If you have any questions, please e-mail me at steve.hill@millernash.com or call me at 360.699.4771.

Steven F. Hill, P.C.

Enclosure

Susan M. Breen-Quinn Brian Kelly Claire Louis

KG2005351

039391-0009/VANDOCS:5014

POLICIES

Carrier:

Industrial Indemnity

Policies:

JE8312723 (04/01/81-04/01/83)

Certain Underwriters at Lloyd's, London (C.T. Bowring)

PY024577 (10/01/77-10/01/78)

Reed Stenhouse Cert. LUS1294 / PY008381 (04/01/80-04/01/81)

LUS1324/PY027381 (04/01/81-04/01/84) LUS1325 / PY027481 (04/01/81-04/01/84) LUS1326 / PY027581 (04/01/81-04/01/82)

LUS1355 (04/01/82-04/01/83)

Certain Underwriters at Lloyd's, London

(J.H. Minet / Landis Pelletier & Parrish)

70107/51910 (03/01/53-03/01/54)

70108/54151 (03/01/54-03/01/55)

73158/LL56155 (03/01/55-03/01/56)

78500/57238 (09/15/55-09/15/58)

75211/LL57956 (03/01/56-03/01/57)

LL2453 (09/17/56-09/17/59)

76128/LL60090 (03/01/57-03/01/58)

79409/62100 (03/01/58-03/01/59)

64500/81538 (03/01/59-03/01/60)

LL65521 (09/15/59-09/15/60)

LL67473 (09/15/60-09/15/61)

LL67477 (09/15/60-09/15/61)

LL69261 (09/15/61-09/15/62)

Certain Underwriters at Lloyd's, London

(J.H. Minet / Chapman & Co / Landis Pelletier & Parrish)

79882 (09/15/58-9/15/60)

79883 (09/15/58-09/15/59)

79884 (09/15/58-09/15/60)

79885 (09/15/58-09/15/60)

80900 (09/15/59-12/31/61)

83086 (09/15/60-12/31/61)

83024 (09/15/60-12/31/61)

83143 (09/15/60-12/31/61)

Certain Underwriters at Lloyd's, London (J.H. Minet; notice to Landis Pelletier & Parrish) LL73974 (09/17/53-09/17/56) LL65521 (09/15/59-09/15/60) 61560/LL69700 (12/31/61-12/31/63) 61561/LL69701 (12/31/61-12/31/63) 64564 (12/31/63-12/31/64) 64022 (12/31/63-12/31/64)

Certain Underwriters at Lloyd's, London (J.H. Minet; notice to Underwriters Service, Inc.) LUS1031/LUS1031A/031382000 (12/31/64-01/01/68) LUS1032/LUS1032A/031383000 (12/31/64-01/01/68) LUS1033/LUS1033A/301384000 (04/22/65-01/01/68) LUS1037/LUS1037A/301384000 (06/01/65-06/01/68) LUS1066/LUS1066A/025114000 (01/01/68-01/30/71) LUS1067/LUS1067A/025115000 (01/01/68-01/30/71) LUS1068/LUS1068A/025116000 (01/01/68-01/31/71) LUS1069 (01/01/68-01/01/71)

Certain Underwriters at Lloyd's, London (Howden) SCU 956483/ 57545/83 (04/01/83-05/01/84) XL500280/57546/83 (04/01/83-05/01/84) XS740072G/58548/84 (05/01/84-04/01/85) SCU956816/58552/84 (05/01/84-04/01/85) XS740074G/58550/84 (05/01/84-04/01/85) XC740075G/58551/84 (05/01/84-04/01/85) 834/58549/84 (05/01/84-04/01/85)

Certain Underwriters at Lloyd's, London (Sedgwick, notice to Alexander & Alexander / Clifton & Company) Risk No. UQA0091 (04/01/83-04/01/84) Risk No. UQA0092 (04/01/83-04/01/84)